

**Hearing Date: November 3, 2009
at 2:00 p.m.**

**Objection Deadline: October 27,
2009**

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

IN RE:

Case No. 08-35653-KRH

CIRCUIT CITY STORES, INC., et al.,

Chapter 11 (Jointly administered)

Debtors,

**SITE A, LLC, A COLORADO
LIMITED LIABILITY COMPANY,**

Movant,

v.

CIRCUIT CITY STORES, INC., et al.,

Respondent.

NOTICE OF MOTION AND HEARING

PLEASE TAKE NOTICE THAT Site A, LLC, a Colorado limited liability company, has filed with the Court a Second Amended Motion of Site A, LLC for Payment of Administrative Expense Claim (the "Motion"). A copy of the Motion has been filed with the Court and forwarded to you.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one). Under Local Bankruptcy Rule 4001-(a)-1, the Court may deem any opposition waived, treat the motion as conceded, and issue an order granting the requested relief without further notice or hearing unless you take the following steps:

Ann K. Crenshaw, Esq. (VSB No. 19538)
Paul K. Campsen, Esq. (VSB No. 18133)
Kaufman & Canoles, a professional corporation
2101 Parks Avenue, Suite 700
Virginia Beach, VA 23451
Tele: (757) 491-4000
Fax: (757) 491-4020

*Counsel for Site A, LLC, a Colorado limited liability company,
successor in interest to JP Thornton, LLC, a Colorado limited liability company*

David J. Dansky, Esq.
Chambers Dansky & Mulvahill, LLC
1601 Blake Street #500
Denver, Colorado 80202
Tele: (303) 825-2222
Fax: (303) 825-4010

1. File with the Court, at the address shown below, a written objection. If you mail your response to the Court for filing, you must mail it early enough so the court will **receive** it on or before **October 27, 2009 at 5:00 p.m.**

William C. Redden, Clerk
United States Bankruptcy Court
701 E. Broad Street, Suite 4000
Richmond, VA 23219

You must also deliver a copy to all parties on the Certificate of Service below and to:

Counsel for Circuit City Stores, Inc.
Douglas M. Foley, Esq.
McGuireWoods LLP
9000 World Trade Center
101 W. Main St.
Norfolk, VA 23510

Counsel for Official Committee of Unsecured Creditors
Brad R. Godshall, Esq.
Pachulski Stang Ziehl & Jones, LLP
10100 Santa Monica Blvd., 11th Floor
Los Angeles, CA 90067-4100

Counsel for Official Committee of Unsecured Creditors
Lynn L. Tavenner, Esquire
Tavenner & Beran, PLC
20 North Eighth Street, 2nd Floor
Richmond, VA 23219

Counsel for Site A, LLC, a Colorado limited liability company
Paul K. Campsen, Esq.
Ann K. Crenshaw, Esq.
Kaufman & Canoles
150 W. Main Street, Suite 2100
Norfolk, VA 23510

2. Attend the hearing scheduled for **November 3, 2009 at 2:00 p.m.** before the Honorable Kevin R. Huennekens, U.S. Bankruptcy Court, Room 5000, United States Courthouse, 701 E. Broad Street, Richmond, Virginia 23219.

If you or your attorneys do not take these steps, the Court may deem any opposition waived, treat the Motion as conceded, and issue an order granting the requested relief without further notice or hearing.

Dated: October 21, 2009

**SITE A, LLC, a Colorado
limited liability company**

By: /s/ Ann K. Crenshaw

Ann K. Crenshaw, Esq. (VSB No. 19538)
Paul K Campsen, Esq. (VSB No. 18133)
Kaufman & Canoles, a professional corporation
2101 Parks Avenue, Suite 700
Virginia Beach, VA 23451
Tele: (757) 491-4000

*Counsel for Site A, LLC, a Colorado limited liability company,
successor in interest to JP Thornton, LLC, a Colorado
limited liability company*

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Notice of Motion and Hearing was sent on this 21st day of October, 2009, to all creditors and parties-in-interest who are included in the United States Bankruptcy Court's ECF e-mail notification system.

/s/ Ann K. Crenshaw

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